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COUNSEL TO THE DEBTORS AND DEBTORS IN POSSESSION

# IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

§

In re:

§ Chapter 11

Senior Care Centers, LLC, et al., 1

Case No. 18-33967 (BJH)

8

Debtors.

(Jointly Administered)

# NOTICE OF AGENDA OF MATTERS SCHEDULED FOR HEARING ON JULY 23, 2019 AT 2:00 P.M. (CT)

# **MATTERS GOING FORWARD**

1. Motion of Debtors for Entry of an Order (I) Approving the Disclosure Statement; (II) Establishing Procedures for the Solicitation and Tabulation of Votes to Accept or Reject the Plan; (III) Scheduling a Confirmation Hearing; (IV) Approving Related Notice Procedures; and (V) Granting Related Relief [Docket No. 1427; Filed 06/24/2019]

Objection Deadline: July 22, 2019

#### Related Document(s):

a) Disclosure Statement for the Debtors' Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [Docket No. 1425; Filed 06/24/2019]

<sup>&</sup>lt;sup>1</sup> The Debtors in the Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are set forth in the *Order (I) Directing Joint Administration of Chapter 11 Cases, and (II) Granting Related Relief* [Docket No. 569] and may also be found on the Debtors' claims agent's website at https://omnimgt.com/SeniorCareCenters. The location of the Debtors' service address is 600 North Pearl Street, Suite 1100, Dallas, Texas 75201.

- b) Debtors' Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [Docket No. 1426; Filed 06/24/2019]
- c) The Official Committee of Unsecured Creditors of Senior Care Centers, LLC, Et Al's Witness and Exhibit List [Docket No. 1625; Filed 07/25/2019]
- d) Debtors' List of Witnesses and Exhibits for July 30, 2019 Hearing [Docket No. 1626; Filed 07/25/2019]
- e) POTA JV, LLC's Witness and Exhibit List for July 30, 2019 Hearing [Docket No. 1628; Filed 07/26/2019]
- f) TXMS Real Estate Investments, Inc.'s List of Witnesses and Exhibits for July 30, 2019 Hearing [Docket No. 1629; Filed 07/26/2019]
- g) List of Witnesses and Exhibits for July 30, 2019 Hearing Filed by Cedar Park Healthcare, LLC [Docket No. 1633; Filed 07/26/2019]
- h) Independent Landlords' Witness and Exhibit List [Docket No. 1634; Filed 07/26/2019]
- i) Second Amended Notice of (I) Hearing to Approve Disclosure Statement and (II) Deadline for Filing Objections to Approval of the Disclosure Statement [Docket No. 1635; Filed 07/26/2019]

- a) Objection of Cedar Park Healthcare, LLC to the Debtors' Disclosure Statement and Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [Docket No. 1578; Filed 07/22/2019]
- b) CIBC Bank USA's Objection to the Debtors' Disclosure Statement [Docket No. 1579; Filed 07/22/2019]
- c) Objection of Love Funding Corporation to the Motion of Debtors for Entry of an Order (I) Approving the Disclosure Statement; (II) Establishing Procedures for the Solicitation and Tabulation of Votes to Accept or Reject the Plan; (III) Scheduling a Confirmation Hearing; (IV) Approving Related Notice Procedures; and (V) Granting Related Relief [Docket No. 1586; Filed 07/22/2019]
- d) POTA JV, LLC's Objection to the Approval of the Disclosure Statement for the Debtors' Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [Docket No. 1587; Filed 07/22/2019]
- e) Letter of Aaron Allison [Docket No. 1588; Filed 07/22/2019]

- f) TXMS Real Estate Investment, Inc.'s Objection to the Motion of Debtors for Entry of an Order (I) Approving the Disclosure Statement; (II) Establishing Procedures for the Solicitation and Tabulation of Votes to Accept or Reject the Plan; (III) Scheduling a Confirmation Hearing; (IV) Approving Related Notice Procedures; and (V) Granting Related Relief [Docket No. 1589; Filed 07/22/2019]
- g) The United States of America's Objection to (A) Debtors' Disclosure Statement and (B) Debtors' Motion for Entry of an Order (I) Approving the Disclosure Statement; (II) Establishing Procedures for the Solicitation and Tabulation of Votes to Accept or Reject the Plan; (III) Scheduling a Confirmation Hearing; (IV) Approving Related Notice Procedures; and (V) Granting Related Relief [Docket No. 1590; Filed 07/22/2019]
- h) United States Trustee's Objection to Disclosure Statement for the Debtors' Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [Docket No. 1591; Filed 07/22/2019]
- i) Independent Landlords' Objection to the Disclosure Statement for the Debtors' Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [Docket No. 1592; Filed 07/22/2019]
- j) Annaly / CHI Javelin Landlords' Objection to the Disclosure Statement for the Debtors' Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [Docket No. 1594; Filed 07/22/2019]
- k) ORIX Real Estate Capital, LLC's Objection to the Debtors' Disclosure Statement [Docket No. 1596; Filed 07/22/2019]
- l) Granite Landlords Objection to and Joinder in Objections to the Disclosure Statement for the Debtors' Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [Docket No. 1620; Filed 07/25/2019]
- m) Texas Health and Human Services Commission's Response to Disclosure Statement Objections filed by the United States of America and the United States Trustee [Docket No. 1632; Filed 07/26/2019]

<u>Status</u>: This matter will go forward as a status conference.

2. Debtors Emergency Motion for an Order to Show Cause [Docket No. 1213; Filed 05/30/2019]

#### Related Document(s):

a) Notice of Debtors Status Report Regarding Vendor Hold for May 31, 2019 [Docket No. 1223; Filed 5/31/2019]

- b) Notice of Debtors Status Report Regarding Vendor Hold for June 1, 2019 [Docket No. 1225; Filed 6/1/2019]
- c) Notice of Debtors Status Report Regarding Vendor Hold for June 2, 2019 [Docket No. 1226; Filed 6/2/2019]
- d) Order Granting Order to Show Cause [Docket No. 1229; Entered 6/3/2019]
- e) Motion of Debtors to Convert Show Cause Hearing On June 3, 2019 to a Status Conference and Reschedule Show Cause Hearing to June 11, 2019 [Docket No. 1248; Filed 6/3/2019]
- f) Order Granting Motion to Change the Show Cause Hearing Set 6/5/2019 to a Status Conference [Docket No. 1264; Entered 6/5/2019]
- g) Notice of Debtors Status Report Regarding Vendor Hold for June 6, 2019 [Docket No. 1286; Filed 6/6/2019]
- h) Notice of Debtors Status Report Regarding Vendor Hold for June 11, 2019 [Docket No. 1313; Filed 6/11/2019]
- i) Order Granting Motion to Continue Hearing [Docket No. 1316; Entered 6/11/2019]
- j) Notice of Debtors Status Report Regarding Vendor Hold for June 18, 2019 [Docket No. 1378; Filed 6/18/2019]
- k) Notice of Debtors Amended Status Report Regarding Vendor Hold for June 18, 2019 [Docket No. 1381; Filed 6/19/2019]
- 1) Notice of Hearing Filed by Debtors [Docket No. 1558; Filed 07/18/2019]
- m) Debtors' List of Witnesses and Exhibits for July 30, 2019 Hearing [Docket No. 1626; Filed 07/25/2019]

- a) Texas Health and Human Services Commission's Motion to Continue Show Cause Hearing, or in the Alternative, to Bifurcate Hearing [Docket No. 1236; Filed 6/3/2019]
- b) Status Report Regarding Prospective Payments From Managed Care Organizations [Docket No. 1245; Filed 6/3/2019]

- c) Texas Health and Human Services Commissions Motion to Continue Show Cause Hearing [Currently Set for June 11, 2019] and to Convert Evidentiary Hearing to Nonevidentiary Status Conference [Docket No. 1289; Filed 6/7/2019]
- d) Texas Health and Human Services Commission's Response to Order to Show Cause Entered Upon Debtors' Emergency Motion for an Order to Show Cause and Motion to Make More Definite and Certain [Docket No. 1298; Filed 6/10/2019]
- e) Texas Health and Human Services Commission's Supplemental Response to Debtors' Applications to Show Cause Why Texas Health and Human Services Should Not be Held in Contempt and Response to Further Status Report Dated June 19, 2019 [Docket No. 1417; Filed 6/24/2019]
- f) Texas Health and Human Services Commission's Second Supplemental Response to Debtors' Applications to Show Cause Why Texas Health and Human Services Should Not be Held in Contempt and Response to Further Status Report Dated June 19, 2019 [Docket No. 1516; Filed 7/10/2019]

<u>Status</u>: This matter will go forward as a status conference.

3. Application for Administrative Expense Claim filed by Creditor Granite Landlords [Docket No. 640; Filed 03/06/2019]

Objection Deadline: April 3, 2019

## Related Document(s):

- a) Motion for Expedited Consideration (Regarding Dkt Nos. 640 and 641) filed by Granite Landlords [Docket No. 642; Filed: 03/06/2019]
- b) Objection of the Official Committee of Unsecured Creditors of Senior Care Centers, LLC, Et Al. to the Granite Landlords' Motion for Expedited Consideration [Docket No. 653; Filed 03/11/2019]
- c) Granite Landlords' Motion for Relief from the Automatic Stay to Permit Granite Landlords to Market Properties to Transition to New Operators [Docket No. 787; Filed 03/29/2019]
- d) Order Regarding Application for Administrative Expense Claim [Docket No. 1067; Entered 05/10/2019]
- e) Objection of the Official Committee of Unsecured Creditors of Senior Care Centers, LLC Et Al. to the Granite Landlords' Motion for Relief from the Automatic Stay to Permit Granite Landlords to Market Properties to Transition to New Operators [Docket No. 1251; Filed 06/04/2019]

- f) Emergency Motion of the Official Committee of Unsecured Creditors of Senior Care Centers, LLC Et Al. to (I) Continue Hearing on Various Pleadings Filed by the Granite Landlords Scheduled for June 11, 2019 and (II) Compel Mediation [Docket No. 1281; Filed 06/06/2019]
- g) Objection of Granite Landlords to Emergency Motion of the Official Committee of Unsecured Creditors to (I) Continue Hearing on Various Pleadings Filed by the Granite Landlords Scheduled for June 11, 2019 and (II) Compel Mediation [Docket No. 1287; Filed 06/07/2019]
- h) G-Debtors' (15) Objection to Granite Landlords' (15) Motion for Relief from the Automatic Stay to Permit Granite Landlords (15) to Market Properties to Transition to New Operators [Docket No. 1294; Filed 06/07/2019]
- i) ORIX Real Estate Capital, LLC's Objection to Emergency Motion of the Official Committee of Unsecured Creditors to (I) Continue Hearing on Various Pleadings Filed by the Granite Landlords Scheduled for June 11, 2019 and (II) Compel Mediation [Docket No. 1295; Filed 06/07/2019]
- j) Granite Landlords' Emergency Motion to Strike Untimely Filed G-Debtors' (15) Objection to Granite Landlords' (15) Motion for Relief from the Automatic Stay to Permit Granite Landlords (15) to Market Properties to Transition to New Operators [Docket No. 1306; Filed 06/11/2019]
- k) The United States of America's (I) Objection to the Committee's Motion to Continue Hearing on Certain Granite Motions and (II) Statement in Support of Granite's Motion for Relief from Stay to Market Properties [Docket No. 1310; Filed 06/11/2019]
- 1) Order Denying the Emergency Motion of the Official Committee of Unsecured Creditors to (I) Continue Hearing on Various Pleadings Filed by the Granite Landlords Scheduled for June 11, 2019 and (II) Compel Mediation [Docket No. 1315; Entered 06/11/2019]
- m) Agreed Order Granting Certain Relief Requested by the Granite Landlords and Setting Hearing on Remaining Issues [Docket No. 1422; Entered 06/24/2019]
- n) Notice of Withdrawal of Granite Landlords' Motion to Strike [Docket No. 1496; Filed 07/05/2019]
- o) Notice of Transfer of Funds Filed by the Debtors [Docket No. 1536; Filed 07/16/2019]
- p) Notice of Hearing Filed by Granite Landlords [Docket No. 1552; Filed 07/17/2019]

- q) Agreed Supplemental Order (I) Approving Settlement Agreement and (II) Granting Related Relief [Docket No. 1583; Entered 07/22/2019]
- r) The Official Committee of Unsecured Creditors of Senior Care Centers, LLC, Et Al's Witness and Exhibit List [Docket No. 1625; Filed 07/25/2019]
- s) Order Granting Consensual Partial Relief and Continuing Hearings Regarding the Granite Matters [Docket No. 1640; Entered 07/29/2019]
- t) Notice of G-Debtors-10 Rejection of Remaining Granite Leases [Docket No. 1641; Filed 07/29/2019]

- a) Objection of the Official Committee of Unsecured Creditors of Senior Care Centers, LLC, Et Al. to the Granite Landlords' Application for Administrative Expense Claim and Motion for the Entry of an Order Granting Adequate Protection Pursuant to 11 U.S.C. §§ 361 and 363 [Docket No. 858; Filed 04/03/2019]
- b) G-Debtors' Objection to the Granite Landlords' Application for Administrative Expense Claim and Motion for the Entry of an Order Granting Adequate Protection Pursuant to 11 U.S.C. §§ 361 and 363 [Docket No. 916; Filed 04/10/2019]
- c) Lancaster Pollard Mortgage Company LLC's Response in Support of the Granite Landlords' Application for Administrative Expense Claim and Motion for Adequate Protection [Docket No. 923; Filed 04/11/2019]
- d) CIBC Bank USA's Objection to the Granite Landlords' Application for Administrative Expense Claim and Motion for the Entry of an Order Granting Adequate Protection Pursuant to 11 U.S.C. §§ 361 and 363 [Docket No. 924; Filed 04/11/2019]
- e) Debtors' Supplemental Response to Pleadings of Granite Landlords [Docket No. 1598; Filed 07/22/2019]
- 4. Motion for Entry of an Order Granting Adequate Protection Pursuant to 11 U.S.C. §§ 361 and 363 filed by Granite Landlords [Docket No. 641; Filed 03/06/2019]

Objection Deadline: April 3, 2019

#### Related Document(s):

a) Motion for Expedited Consideration (Regarding Dkt Nos. 640 and 641) filed by Granite Landlords [Docket No. 642; Filed: 03/06/2019]

- b) Objection of the Official Committee of Unsecured Creditors of Senior Care Centers, LLC, Et Al. to the Granite Landlords' Motion for Expedited Consideration [Docket No. 653; Filed 03/11/2019]
- c) Granite Landlords' Motion for Relief from the Automatic Stay to Permit Granite Landlords to Market Properties to Transition to New Operators [Docket No. 787; Filed 03/29/2019]
- d) Order Regarding Application for Administrative Expense Claim [Docket No. 1067; Entered 05/10/2019]
- e) Objection of the Official Committee of Unsecured Creditors of Senior Care Centers, LLC Et Al. to the Granite Landlords' Motion for Relief from the Automatic Stay to Permit Granite Landlords to Market Properties to Transition to New Operators [Docket No. 1251; Filed 06/04/2019]
- f) Emergency Motion of the Official Committee of Unsecured Creditors of Senior Care Centers, LLC Et Al. to (I) Continue Hearing on Various Pleadings Filed by the Granite Landlords Scheduled for June 11, 2019 and (II) Compel Mediation [Docket No. 1281; Filed 06/06/2019]
- g) Objection of Granite Landlords to Emergency Motion of the Official Committee of Unsecured Creditors to (I) Continue Hearing on Various Pleadings Filed by the Granite Landlords Scheduled for June 11, 2019 and (II) Compel Mediation [Docket No. 1287; Filed 06/07/2019]
- h) G-Debtors' (15) Objection to Granite Landlords' (15) Motion for Relief from the Automatic Stay to Permit Granite Landlords (15) to Market Properties to Transition to New Operators [Docket No. 1294; Filed 06/07/2019]
- i) ORIX Real Estate Capital, LLC's Objection to Emergency Motion of the Official Committee of Unsecured Creditors to (I) Continue Hearing on Various Pleadings Filed by the Granite Landlords Scheduled for June 11, 2019 and (II) Compel Mediation [Docket No. 1295; Filed 06/07/2019]
- j) Granite Landlords' Emergency Motion to Strike Untimely Filed G-Debtors' (15) Objection to Granite Landlords' (15) Motion for Relief from the Automatic Stay to Permit Granite Landlords (15) to Market Properties to Transition to New Operators [Docket No. 1306; Filed 06/11/2019]
- k) The United States of America's (I) Objection to the Committee's Motion to Continue Hearing on Certain Granite Motions and (II) Statement in Support of Granite's Motion for Relief from Stay to Market Properties [Docket No. 1310; Filed 06/11/2019]

- 1) Order Denying the Emergency Motion of the Official Committee of Unsecured Creditors to (I) Continue Hearing on Various Pleadings Filed by the Granite Landlords Scheduled for June 11, 2019 and (II) Compel Mediation [Docket No. 1315; Entered 06/11/2019]
- m) Agreed Order Granting Certain Relief Requested by the Granite Landlords and Setting Hearing on Remaining Issues [Docket No. 1422; Entered 06/24/2019]
- n) Notice of Withdrawal of Granite Landlords' Motion to Strike [Docket No. 1496; Filed 07/05/2019]
- o) Notice of Transfer of Funds Filed by the Debtors [Docket No. 1536; Filed 07/16/2019]
- p) Notice of Hearing Filed by Granite Landlords [Docket No. 1552; Filed 07/17/2019]
- q) Agreed Supplemental Order (I) Approving Settlement Agreement and (II) Granting Related Relief [Docket No. 1583; Entered 07/22/2019]
- r) The Official Committee of Unsecured Creditors of Senior Care Centers, LLC, Et Al's Witness and Exhibit List [Docket No. 1625; Filed 07/25/2019]
- s) Order Granting Consensual Partial Relief and Continuing Hearings Regarding the Granite Matters [Docket No. 1640; Filed 07/29/2019]
- t) Notice of G-Debtors-10 Rejection of Remaining Granite Leases [Docket No. 1641; Filed 07/29/2019]

- a) Objection of the Official Committee of Unsecured Creditors of Senior Care Centers, LLC, Et Al. to the Granite Landlords' Application for Administrative Expense Claim and Motion for the Entry of an Order Granting Adequate Protection Pursuant to 11 U.S.C. §§ 361 and 363 [Docket No. 858; Filed 04/03/2019]
- b) G-Debtors' Objection to the Granite Landlords' Application for Administrative Expense Claim and Motion for the Entry of an Order Granting Adequate Protection Pursuant to 11 U.S.C. §§ 361 and 363 [Docket No. 916; Filed 04/10/2019]
- c) Lancaster Pollard Mortgage Company LLC's Response in Support of the Granite Landlords' Application for Administrative Expense Claim and Motion for Adequate Protection [Docket No. 923; Filed 04/11/2019]

- d) CIBC Bank USA's Objection to the Granite Landlords' Application for Administrative Expense Claim and Motion for the Entry of an Order Granting Adequate Protection Pursuant to 11 U.S.C. §§ 361 and 363 [Docket No. 924; Filed 04/11/2019]
- e) Debtors' Supplemental Response to Pleadings of Granite Landlords [Docket No. 1598; Filed 07/22/2019]

Status: This matter will go forward.

5. Granite Landlords' Motion for Relief from the Automatic Stay to Permit Granite Landlords to Market Properties to Transition to New Operators [Docket No. 787; Filed 03/29/2019]

Objection Deadline: April 12, 2019

#### Related Document(s):

- a) Emergency Motion of the Official Committee of Unsecured Creditors of Senior Care Centers, LLC Et Al. to (I) Continue Hearing on Various Pleadings Filed by the Granite Landlords Scheduled for June 11, 2019 and (II) Compel Mediation [Docket No. 1281; Filed 06/06/2019]
- b) Objection of Granite Landlords to Emergency Motion of the Official Committee of Unsecured Creditors to (I) Continue Hearing on Various Pleadings Filed by the Granite Landlords Scheduled for June 11, 2019 and (II) Compel Mediation [Docket No. 1287; Filed 06/07/2019]
- c) ORIX Real Estate Capital, LLC's Objection to Emergency Motion of the Official Committee of Unsecured Creditors to (I) Continue Hearing on Various Pleadings Filed by the Granite Landlords Scheduled for June 11, 2019 and (II) Compel Mediation [Docket No. 1295; Filed 06/07/2019]
- d) The United States of America's (I) Objection to the Committee's Motion to Continue Hearing on Certain Granite Motions and (II) Statement in Support of Granite's Motion for Relief from Stay to Market Properties [Docket No. 1310; Filed 06/11/2019]
- e) Order Denying the Emergency Motion of the Official Committee of Unsecured Creditors to (I) Continue Hearing on Various Pleadings Filed by the Granite Landlords Scheduled for June 11, 2019 and (II) Compel Mediation [Docket No. 1315; Entered 06/11/2019]
- f) Agreed Order Granting Certain Relief Requested by the Granite Landlords and Setting Hearing on Remaining Issues [Docket No. 1422; Entered 06/24/2019]

- g) Notice of Transfer of Funds Filed by the Debtors [Docket No. 1536; Filed 07/16/2019]
- h) Notice of Hearing Filed by Granite Landlords [Docket No. 1552; Filed 07/17/2019]
- i) Agreed Supplemental Order (I) Approving Settlement Agreement and (II) Granting Related Relief [Docket No. 1583; Entered 07/22/2019]
- j) The Official Committee of Unsecured Creditors of Senior Care Centers, LLC, Et Al's Witness and Exhibit List [Docket No. 1625; Filed 07/25/2019]
- k) Order Granting Consensual Partial Relief and Continuing Hearings Regarding the Granite Matters [Docket No. 1640; Filed 07/29/2019]
- l) Notice of G-Debtors-10 Rejection of Remaining Granite Leases [Docket No. 1641; Filed 07/29/2019]

- a) Objection of the Official Committee of Unsecured Creditors of Senior Care Centers, LLC Et Al. to the Granite Landlords' Motion for Relief from the Automatic Stay to Permit Granite Landlords to Market Properties to Transition to New Operators [Docket No. 1251; Filed 06/04/2019]
- b) G-Debtors' (15) Objection to Granite Landlords' (15) Motion for Relief from the Automatic Stay to Permit Granite Landlords (15) to Market Properties to Transition to New Operators [Docket No. 1294; Filed 06/07/2019]
- c) Granite Landlords' Emergency Motion to Strike Untimely Filed G-Debtors' (15) Objection to Granite Landlords' (15) Motion for Relief from the Automatic Stay to Permit Granite Landlords (15) to Market Properties to Transition to New Operators [Docket No. 1306; Filed 06/11/2019]
- d) Notice of Withdrawal of Granite Landlords' Motion to Strike [Docket No. 1496; Filed 07/05/2019]
- e) Debtors' Supplemental Response to Pleadings of Granite Landlords [Docket No. 1598; Filed 07/22/2019]

Status: This matter will go forward.

6. Granite Landlords' Motion to Enforce Terms of Settlement Agreement with the G-Debtors [Docket No. 1533; Filed 07/15/2019]

Objection Deadline: July 23, 2019

#### Related Document(s):

- a) Motion of G-Debtors for Entry of an Order Approving Compromise and Settlement Pursuant to Bankruptcy Rule 9019 and Granting Related Relief [Docket No. 902; Filed 04/09/2019]
- b) Order Granting Motion for Approval of Compromise and Settlement Pursuant to Bankruptcy Rule 9019 [Docket No. 1053; Entered 05/07/2019]
- c) Notice of Hearing filed by Granite Landlords [Docket No. 1552; Filed 07/17/2019]
- d) The Official Committee of Unsecured Creditors of Senior Care Centers, LLC, Et Al's Witness and Exhibit List [Docket No. 1625; Filed 07/25/2019]
- e) Order Granting Consensual Partial Relief and Continuing Hearings Regarding the Granite Matters [Docket No. 1640; Filed 07/29/2019]
- f) Notice of G-Debtors-10 Rejection of Remaining Granite Leases [Docket No. 1641; Filed 07/29/2019]

### Response(s) Received:

a) Debtors' Supplemental Response to Pleadings of Granite Landlords [Docket No. 1598; Filed 07/22/2019]

Status: This matter will go forward.

Dated: July 29, 2019 Dallas, Texas Respectfully submitted,

#### **POLSINELLI PC**

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-and-

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